## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

DEDICATED NURSING ASSOCIATES, INC.,

Plaintiff,

v.

JUDGE MICHAEL M. WATSON

Case No. 2:25-cv-00236

VASC

MAGISTRATE JUDGE CHELSEY M. VASCURA

BUCKEYE FOREST AT AKRON LLC d/b/a HIGH SQUARE REHABILITATION NURSING CENTER, et. al.,

Defendants.

## DISCLOSURE STATEMENT PURSUANT TO LOCAL RULE 7.1.1 AND FED. R. CIV. P. 7.1

Pursuant to Fed. R. Civ. P. 7.1 and Local Rule 7.1.1 of the Southern District of Ohio, and to enable Judges and Magistrate Judges to evaluate possible disqualification or recusal, the undersigned counsel for Defendants Buckeye Forest at Akron LLC d/b/a Highland Square Rehabilitation and Nursing Center ("Akron"), Buckeye Forest at Bellefontaine LLC d/b/a Ayden Healthcare of Belle Springs ("Bellefontaine"), Buckeye Forest at Cleveland LLC d/b/a Gardens of Euclid Beach ("Euclid"), Buckeye Forest at Greenville LLC d/b/a Ayden Healthcare of Greenville ("Greenville"), Buckeye Forest at Madeira LLC d/b/a Ayden Healthcare of Madeira ("Madeira"), Buckeye Forest at Mayfield Heights LLC d/b/a Gardens of Mayfield Heights ("Mayfield"), Buckeye Forest at North Olmsted LLC d/b/a Gardens of North Olmsted ("Olmsted"), Buckeye Forest at Waterville LLC d/b/a Ayden Healthcare of Waterville ("Waterville"), Buckeye Forest at Fairfield LLC d/b/a Ayden Healthcare of Fairfield ("Fairfield"), and Med Healthcare Partners, LLC ("Med Healthcare" and collectively with Akron, Bellefontaine, Euclid, Greenville, Madeira,

Mayfield, Olmsted, Waterville, and Fairfield, "Defendants"), in the above-captioned action, certifies that there are no parents, subsidiaries, and/or affiliates of said parties that have issued shares or debt securities to the public. No publicly owned corporation has a financial interest in the outcome of this action.

Furthermore, the following is a list of the names and citizenships attributed to the parties represented by the undersigned counsel:

- 1. Defendant Buckeye Forest at Akron LLC d/b/a Highland Square Rehabilitation and Nursing Center is a limited liability company organized under the laws of the State of New York. Its sole member is Larry Katz, who is a resident of the State of New York.
- 2. Defendant Buckeye Forest at Bellefontaine LLC d/b/a Ayden Healthcare of Belle Springs is a limited liability company organized under the laws of the State of New York. Its sole member is Ephram Lahasky, who is a resident of the State of New York.
- 3. Defendant Buckeye Forest at Cleveland LLC d/b/a Gardens of Euclid Beach is a limited liability company incorporated under the laws of the State of New York. Its members are Ephram Lahasky and Larry Katz, who are both residents of the State of New York.
- 4. Defendant Buckeye Forest at Greenville LLC d/b/a Ayden Healthcare of Greenville is a limited liability company organized under the laws of the State of New York. Its sole member is Ephram Lahasky, who is a resident of the State of New York.
- 5. Defendant Buckeye Forest at Madeira LLC d/b/a Ayden Healthcare of Madeira is a limited liability company organized under the laws of the State of New York. Its members are Solomon Kazarnovsky and Abba Stein, who are both residents of the State of New York.

6. Defendant Buckeye Forest at Mayfield Heights LLC d/b/a Gardens of Mayfield

Heights is a limited liability company organized under the laws of the State of New York. Its

members are Michael Hoch and Samuel Feuer, who are both residents of the State of New York.

7. Defendant Buckeye Forest at North Olmsted LLC d/b/a Gardens of North Olmsted

is a limited liability company organized under the laws of the State of New York. Its members are

Michael Hoch and Samuel Feuer, who are both residents of the State of New York.

8. Defendant Buckeye Forest at Waterville LLC d/b/a Ayden Healthcare of Waterville

is a limited liability company organized under the laws of the State of New York. Its sole member

is Ephram Lahasky, who is a resident of the State of New York.

9. Defendant Buckeye Forest at Fairfield LLC d/b/a Ayden Healthcare of Fairfield is

a limited liability company organized under the laws of the State of New. Its members are Solomon

Kazarnovsky and Abba Stein, who are both residents of the State of New York.

10. Defendant Med Healthcare Partners, LLC is a limited liability company organized

under the laws of the State of Delaware. Its sole member is Ephram Lahasky, who is a resident of

the State of New York.

Dated: May 28, 2025

Respectfully submitted,

/s/ Sarah M. Benoit

Sarah M. Benoit (0086616), Trial Attorney

John N. Huffman (0102116)

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Counsel for Defendants

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was electronically filed with the Clerk of Courts on May 28, 2025, which will serve a copy of the foregoing on all counsel of record.

/s/ Sarah M. Benoit

Sarah M. Benoit (0086616)

Counsel for Defendants